REMARKS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Examiner Interview

Applicants' representative, Mr. Kelty, thanks the examiner for the telephone interview on April 9, 2004 to discuss the invention of the application to clarify the difference between the prior art of record and the invention of the application. The difference discussed are described in greater detail below in the discussion distinguishing the pending claims from the applied prior art.

Status of Claims

The Office Action mailed January 2, 2004 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-12 were pending in the application. Claims 1-12 have been canceled and replaced by new claims 13-24. Therefore, claims 13-24 are pending in the application and are submitted for consideration.

This amendment adds and deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Prior Art Rejections

In the Office Action, claims 1-5, 11, and 12 are rejected 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 5,999,939 ("De Hilster") in view of U.S. Pat. No. 6,623,529 ("Lakritz"). Claims 6, 7, and 10 are rejected 35 U.S.C. §103(a) as being unpatentable over De Hilster in view of Lakritz and further in view of U.S. Pat. No. 5,835,712 ("DuFresne"). Claims 8 and 9 are rejected 35 U.S.C. §103(a) as being unpatentable over De Hilster in view of Lakritz and further in view of DuFresne and U.S. Pat. No. 5,987,480 ("Donohue"). Claims 1-3 and 10-12 are rejected 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 6,605,120 ("Fields") in view of U.S. Pat. No. 6,088,700 ("Larsen"). Claims 4 and 5 are rejected 35 U.S.C. §103(a) as being unpatentable over Fields in view of Larsen and further in view of Lakritz. Claims 6 and 7 are rejected 35 U.S.C. §103(a) as being unpatentable over Fields in view of Larsen and further in view of DuFresne. Claims 8 and 9 are rejected 35 U.S.C. §103(a) as being unpatentable over Fields in view of Larsen and further in view of

DuFresne and Donohue. Applicants respectfully traverse these rejections, insofar as they may be applied to the presently pending claims, for at least the following reasons.

The new independent claims 13, 24, and 25 and dependent claims 15 and 16 recite a method (or system or software) that automatically <u>pre processes a resume using lexical and content analysis to determine the origin, language and type of resume, and then determines the selection of an appropriate template to use, where the template is an intelligent description of discreet sets of layouts and topologies of the resume as well as sets of categories and sets or series of sections of text information for each category</u>. The claimed processing assumes no prior knowledge of the "alien" document (resume) and there is also no prior knowledge of the origin or language of the resume, which itself cannot be assumed to be generated in a computer system. This makes processing intelligence very different based on the fact that it is entirely relying on syntactical and contents analysis for any determinations concerning the resume both regarding language, origin, as well as layout and topology and the presence or not of different types of document sections and section categories. Accordingly, the claimed invention provides efficient resume processing that takes advantage of unique intelligence provided by the syntactical and contents analysis as well as the layout and topology analysis. At least these claimed features are <u>not</u> taught or suggested by prior art.

New claims 19, 20, 23, and 24 recite a method (or system or software) that based on mechanism of default templates, themselves intelligent descriptions of different fundamental language structures and language dependent lexical definitions and descriptions, that provide a "fall-back" processing mechanism where the pre processing system fails to determine the resume type. As with other claims the processing does not assume any prior knowledge of the "alien" document (resume) and furthermore, there is also no prior knowledge of the origin or language of the resume, which itself cannot be assumed to be generated in a computer system. At least these claimed features are <u>not</u> taught or suggested by prior art.

Specifically, *De Hilster* focuses on the unstructured text to data transformation and especially on a feedback loop where the author of the document goes back and <u>manually corrects</u> and modifies the submitted document. *Larsen* is concerned using data stored in a database to automatically fill out data fields of multiple forms and is really the opposite of the claimed invention. *Lakritz* is concerned with allowing multi-lingual web presentations (the

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opposite of the claimed invention) of multi-lingual data stored in a controlled database and data storage, where language detection is mainly based on manual user input or browser or system settings such as origin of the browsers IP address. Neither of these references (nor their reasonable combination) discloses or suggests anything related to *syntactical and contents analysis* for any conclusions and determinations concerning the resume both regarding language, origin as well as *layout and topology* and the presence or not of different types of document sections and section categories, when processing an incoming "alien" document where the system has *no prior knowledge* of the layout, topology or origin and language of the resume.

Furthermore, none of the other applied references disclose or suggest these features recited in the pending claims. Specifically, *Fields* focuses on extracting web content from a web page, which is a highly structured document type with pre-defined TAGS (labels) for each section and or paragraph. Further a web page is stored and managed on a computer server which adds to the predictability and pre-determination of the environment and the types of information stored. The filter defined by Fields is used to present an original web page transformed into another web page presentation, hence is more the opposite of the claimed invention too.

DuFresne focuses on defining HTML extension TAGS for implementing a dynamic web environment for displaying of web pages to web users. The data to be presented is stored in a database directly or indirectly controlled by the system. The focus is on the maintenance and deployment systems and methods in hypertext environment, which is a TAGGED format.

Donohue focuses on displaying dynamic web pages to a web user, the data comes from a data source (storage) on a server and this data is structured with a hierarchical relationship.

Therefore, none of the applied prior art disclose or suggest at least one or more features recited in the pending independent claims. Accordingly, the pending independent claims are patentable over the applied prior art.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they ultimately depend. In addition, they recite additional features which are also patentable when considered as a whole.

For example, new claims 18-19 recite using a default template for each language. Claim 8 recites that the default template includes alternative lexical and language structures, layouts, topologies and keywords of a group to associate a resume content with the category associated with the group. These recited features are also not disclosed or suggested by the applied prior art and provides additional reasons for the patentability of these claims.

Conclusion

In view of the above, applicants believe that the present application is now in condition for allowance. Accordingly, entry of the instant amendment and favorable reconsideration of the application as amended is respectfully requested.

The Examiner is courteously invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, postdated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. § 1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

Date June 2, 2004   By _Aaron C. Chatterjee_

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